

401615/025

May 21, 1987

TO: Coal File

FROM: Pamela Grubaugh-Littig, Reclamation Engineer *pgl*

RE: Site Visit to "Cave to Surface" in Bear Canyon Seam,
Response to Letter from Mel Coonrod Dated May 9, 1987, Bear
Canyon Mine, ACT/015/025, Folder #2, Emery County, Utah

Bill Malencik and Pamela Grubaugh-Littig conducted an on-site visit of the "cave to surface" dilemma outlined in the letter to John Whitehead from Mel Coonrod, dated May 9, 1987. Bill Malencik, Pamela Grubaugh-Littig, Mel Coonrod and Ken Defa accessed the "cave to surface" via the underground workings.

The "cave to surface" area involved about 15 feet of displacement from the mine floor to the surface. This event had occurred "sometime in April". The area has muddy debris scattered around the site. It appears that this may have been a cave used by Indians. (Mel Coonrod stated that a "paleo study" had been done in this area, but had no specifics.)

Mel Coonrod explained how Co-Op's mining practice is to mine to the oxidized coal which is usually within 200 feet of the outcrop. (Note: Plate 3-4 dated 4/15/87, drawn by Dan Guy and received 5/13/87 at the Division, noted the outcrop line and 200' minimum barrier on only part of mine sequence. The 200' minimum barrier had not been drawn on the northern part of the permit area where the "cave" occurred.)

Ken Defa, Co-Op, said that he had talked to Bill Poncroff and/or John Turner from MSHA. They had told him to "leave the caved area open as an escapeway and fence it off to deny public access". I called Mr. Poncroff (MSHA) on May 20, 1987, and he said he had not been notified of the caved area by Co-Op. He said he would check out the situation and telephone their observations and recommendations to me by May 29, 1987.

This "exposed underground opening" must be "managed to prevent acid or toxic drainage from entering ground and surface waters, minimize disturbance to the prevailing hydrologic balance and insure the safety of people, livestock, fish and wildlife, and machinery in the mine plan adjacent area" (UMC 817.13).

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By virtue of the configuration of the opening, i.e., there is a 15-foot ascent from the mine to the surface, obviously no waters will drain from the mine. The major consideration will be prevention of public access. Chain link should be constructed to deny access along the entire "cave" area. A door with a one-way lock (access only from inside the mine) should be built into the fence. A sign must be posted prohibiting the entrance of unauthorized persons. The debris should be cleaned up. A permanent reclamation plan must be submitted which includes the sealing and backfilling plan and reclamation cost estimate.

Additionally, a request for the 200-foot minimum barrier must be drawn on the entire mine plan area on Plate 3-4 and the MRP revised, where appropriate.

djh
cc: J. Whitehead
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